

1401 H Street, N.W.
Suite 1020
Washington, D.C. 20005
Office 202/326-3810



Celia Nogales
Director - Federal Relations

April 10, 1998

EX PARTE OR LATE FILED

RECEIVED

APR 10 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

Re: **Ex Parte Filing**
CC Docket 92-237

Dear Ms. Salas:

On April 9, 1998, Tim J. Mack and I spoke to Geraldine Matise, Chief of the Network Services Division and Renee Alexander to discuss implementation of 101XXXX dialing. The attached material was used as part of our discussion.

If you have any questions or require additional information, please call me at 202-326-3810.

Sincerely,

A handwritten signature in cursive script that reads "Celia Nogales".

Attachment

cc: G. Matise
R. Alexander

No. of Copies rec'd
USABODE

002

**Administration of the North
American Numbering Plan,
Carrier Identification Codes
(CICs) CC Docket No. 92-237**

Exparte

April 9, 1998

CC Docket 92-237 Order - Requirements

- **Three primary ingredients needed to implement 101XXXX Dialing:**
 - **LECs provision their network to process 4-Digit CICs**
 - **IXCs provision their network to process 4-Digit CICs**
 - **IXCs educate customers of dialing change**

CC Docket 92-237 Order

Order contains “2 - Step Process”:

- 1) On 1/1/98 “Step One” Completes. All LECs that provide Equal access must have completed switch changes to recognize 4-Digit CICs (Paragraph 4)**

- 2) On 6/30/98 “Step Two” completes. All IXC's complete preparation in their networks to accept 4-Digit CICs, and educate their customers about the new 4-Digit CIC/7-Digit CAC dialing process, thus ending the “permissive dialing period” (Paragraph 4).**

CC Docket 92-237 Order - Confusion

- After that date [6/30/98], only four-digit CICs and seven-digit CACs will be recognized. (Paragraph 4).

CC Docket 92-237 Order - Interpretation

- **Customers are educated that the “permissive dialing period” ends 6/30/98. (True from a consumer perspective.)**
- **IXC’s networks are provisioned to accept 4-digit CIC/ 7-Digit CAC dialing by 6/30/98. (True from a consumer perspective and an IXC operational perspective.)**

CC Docket 92-237 Order - Interpretation

- **LEC networks capable of processing 3-Digit CICs/5-Digit CAC dialing by 1/1/98 (True from a consumer and an operational perspective.)**
- **LEC networks stop processing 3-Digit CICs/5-Digit CAC dialing by 6/30/98. (True from a consumer perception perspective. False from an internal LEC operational perspective. Establishes beginning of the “LEC operational transition period”).**

CC Docket 92-237 Order - Announcement

LEC operational transition steps

Prep Work (5/1/98 - 6/30/98):

- 1) Create Carrier Access Code Dialing announcement**
- 2) Distribute announcement to switch locations**

Translations Work (7/1/98 - 8/30/98):

- 1) Replace Carrier Access Code Error announcement with Carrier Access Code Dialing announcement**
- 2) Program switches to direct calls dialed with 5-Digit Carrier Access Code (e.g., 10XXX) to the new announcement**
- 3) Conduct Tests**



CC Docket 92-237 Order - Reality

Operational steps not discussed in the Order:

- **2 to 3 hours of switch translation work is required per LEC office to provision switch to intercept 3-Digit CIC/5-Digit CAC dialed calls and route to the educational announcement.**
- **Complexity of converting hundreds of switches**
- **In Ameritech, this work is scheduled to take approximately 2 months to complete.**
- **“Flash cut” is not operationally/technically feasible.**

CC Docket 92-237 Order - Reality

- **In Ameritech, over 700 switches require translation changes. Scheduled to begin 7/1/98 and complete by 8/30/98**
- **Switches in queue will continue to process 3-Digit CIC/5-Digit CAC dialed calls as they do today**
- **Once translations are complete, the switch will route 3-Digit/5-Digit CAC dialed calls to the educational announcement**



CC Docket 92-237 Order - Reality

- **If the Order is missing anything, it is a discussion addressing the “LEC operational transition period”.**

CC Docket 92-237 Order - Announcement

- **The Order requires LECs to offer a standard intercept message beginning on or before June 30, 1998, explaining that a dialing pattern change has occurred and instructing the caller to contact its IXC for further information (paragraph 26).**

CC Docket 92-237 Order - Announcement

NIIF Industry Consensus Statement (3/98):

“Your call cannot be completed as dialed. If you dialed a 5 digit code, it has changed. Please redial adding a one and a zero before the 5 digit code, or for assistance contact the carrier you are trying to use.”



CC Docket 92-237 Order - Public Interest

- **From a consumer perspective, the establishment of one national date (6/30/98) identifying the conclusion of the “permissive dialing period” is in the public’s interest**
- **This accomplishes the commission’s stated objectives (para. 25) and eliminates consumer confusion**
- **Consumer’s calls dialed using a 3-Digit CIC/5-Digit CAC dialing sequence will continue to be processed as today until the translations are complete on a switch by switch basis which will send calls dialed in this manner to the educational announcement**